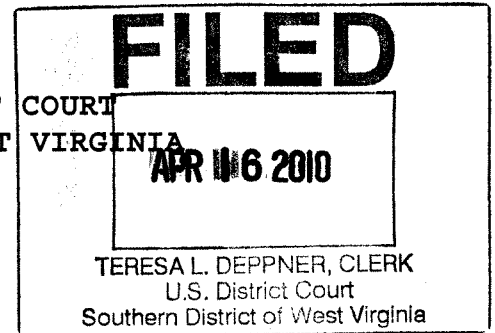


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:10-0498

SHIDA S. JAMIE, JAMES S. "JIMMY" JAMIE,
AND GOLDEN HEART IN HOME CARE, LLC,

Defendants.

UNITED STATES EX PARTE MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Now comes the United States of America ("United States"), and pursuant to 18 U.S.C. § 1345 and Fed. R. Civ. P. 65(b), moves ex parte for a temporary restraining order and preliminary injunction to prevent a continuing and substantial injury to the United States, the Medicaid Program, and the public. The United States seeks to enjoin Shida S. Jamie ("Shida Jamie"), James S. "Jimmy" Jamie ("Jimmy Jamie"), and Golden Heart In Home Care, LLC ("Golden Heart") from the commission of Federal Health care offenses as defined in 18 U.S.C. § 24. The United States further seeks a restraining order freezing property and assets derived from the commission of Federal health care offenses, or property and assets of equivalent value, and a temporary restraining order and preliminary injunction prohibiting any person from withdrawing, transferring, removing, dissipating or disposing of such property, or assets, or property or assets of equivalent value. In support

of this motion, the United States incorporates its Complaint for Injunctive Relief, the Affidavit of Special Agent Mary Ann Withrow, United States Department of Health and Human Services, Office of Inspector General, Office of Investigation, and its supporting memorandum.

WHEREFORE, the United States respectfully requests that the Court enter a temporary restraining order to stop Shida Jamie, Jimmy Jamie, and Golden Heart from the commission of Federal health care offenses as defined in 18 U.S.C. § 24, and freezing property or assets derived from the commission of a Federal health care offense, or property or assets of equivalent value, and prohibiting any person from withdrawing, transferring, removing, dissipating or disposing of such property, or assets, or property or assets of equivalent value until the parties can be heard on the motion for a preliminary injunction.

Respectfully submitted,

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s/Carol A. Casto

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